

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg Division**

VALERIE DUFORT,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 6:21-cv-00054
)	
LIBERTY UNIVERSITY, INC.)	
)	
Defendant.)	
)	

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

The Parties respectfully move this Court for entry of the proposed Agreed Protective Order attached hereto (the “Protective Order”).

In support, the Parties state as follows:

1. Entry of the stipulated Protective Order is necessary to protect the Parties’ confidential financial, medical, and proprietary business information and the sensitive information of Defendant’s students, as such information requires heightened protection from disclosure.
2. The Parties have been operating under the terms of the Protective Order throughout discovery in this matter and would like to continue to operate under these terms for the remainder of this litigation.
3. The Parties have agreed to the terms of the stipulated Protective Order, and seek the Court’s approval and entry in the form submitted.

WHEREFORE, the Parties respectfully request entry of the stipulated Protective Order attached hereto.

Dated: November 8, 2022

Respectfully submitted,

WOODS ROGERS PLC

s/ Leah M. Stiegler

King F. Tower, Esq. (VSB No. 38767)

ktower@woodsrogers.com

Leah M. Stiegler, Esq. (VSB No. 89602)

lstiegler@woodsrogers.com

WOODS ROGERS PLC

10 South Jefferson Street, Suite 1400

Roanoke, Virginia 24011

Telephone: (540) 983-7600

Facsimile: (540) 983-7711

Attorneys for Liberty University, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on this 8th day of November, 2022, the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing (NEF) to counsel of record.

s/ Leah M. Stiegler